



Accumulation Point Management

FACT SHEET 37-001-1010

The following is based on Federal criteria. State and local regulations may be more stringent.

Satellite Accumulation Point: An accumulation and storage point at or near the generating process. "At or near" could mean a flammable storage cabinet in the same room as the generating process or an area not necessarily in the same room but under the direct supervision or control of the operator of the waste generating process. No permits are required for this type of storage. You may accumulate up to 55 gallons of hazardous waste stored in this area or up to a quart of acutely hazardous waste in this area with no constraints on storage time [40 Code of Federal Regulations (CFR) 262.34 (c)(1)]. Any amount of waste over the 55 gallon or one quart limit must be dated with the accumulation start date (date when excess started) and transferred to a 90-day temporary storage site within three days [40 CFR 262.34 (c)(2)]. The waste must be stored in containers in good condition and compatible with the waste [40 CFR 265.171-172]. When no waste is being transferred into or out of the container, the lid, cap, or bungs must be in place. The container must be sealed [40 CFR 265.173(a)]. If you are storing flammable waste in a container of greater than 1-gallon capacity, the container must be constructed of metal [29 CFR 1910.106(d) Table H-12] unless the glass or plastic containers are the industry standard for storing that chemical AND the containers must be DOT approved for shipping that chemical [OSHA Instruction STD 01-05-014, October, 24 1980]. A label must be placed on the container with the words "Hazardous Waste" or some other marking stating the contents [40 CFR 262.34(a)(3)].

Recommendations: Placing your waste back into its original container assures that you are using the proper container for that waste. Store your waste containers in an appropriate cabinet or locker (i.e., a flame cabinet or a corrosive cabinet). Have an SOP in place that discusses the storage/disposal procedures. The SOP should include the POC for disposal as well as labeling and marking requirements for waste containers. Remember that the disposal process is not instantaneous. It could take up to 30 days to have the waste removed. Make sure your waste is removed from your area before you reach your storage capacity. It is a good idea to perform periodic inspections of the storage area to ensure there are no leaks and the containers are closed and properly labeled.

Many installations are instituting weekly inspections for satellite accumulation points. Check the installation environmental office for local requirements.

90-Day Temporary Storage Point: An accumulation and storage point area removed from the generating process but still on the facility property. For example, use a separate storage building or a room in another part of the building. No permits are required for this type of storage area. Waste that is stored in this area must be in containers that are in good condition and compatible with the contents of the container (40 CFR 265.171-172). If you are storing flammable waste in a container of greater than 1-gallon capacity, the container must be constructed of metal [29 CFR 1910.106(d) Table H-12] unless the glass or plastic containers are the industry standard for storing that chemical AND the containers must be DOT approved for shipping that chemical [OSHA Instruction STD 01-05-014, October 24, 1980]. The container must have a properly filled out hazardous waste label on it that includes the identity of the contents and the accumulation start date. The accumulation start date begins when the first drop is placed in a container in the storage area or when a full container is brought to the storage area.

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(NOTE: Full containers should already be dated; see Satellite Accumulation Point above.) This area must also have adequate aisle space to allow unobstructed movement of personnel, fire equipment, spill control equipment, and decontamination equipment. Periodic (weekly) inspections must be made and documented to detect leaks and signs of deterioration (40 CFR 265.174). This storage area must have: an internal communications or alarm system; a two-way communications device; fire control devices suitable for the waste in the storage area; spill control equipment; decontamination equipment; and sufficient water to support hose streams or an automatic sprinkler system (40 CFR 265.32). You must have a full-time emergency coordinator or designee who is on site or on call 24 hours a day [40 CFR 262.34(d)(5) and 265.55]. This area must have a written spill contingency plan (40 CFR 265.52). Train personnel to handle emergencies and maintain the training records for at least three years after the date the employee last worked at the facility (40 CFR 265.16). When this storage area ceases to be used as a 90-day temporary storage area, the site must undergo closure procedures (40 CFR 265.111 and 265.114).

Recommendations: Place the containers in or on a secondary spill containment device such as a spill tray. Separate different compatibility groups using aisle space, dikes, berms, or just distance. Have the emergency numbers posted by the communications device so in the event of an emergency the appropriate services can be notified. Post an SOP stating what to do in the case of an emergency.